

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

\*

v.

\*

Criminal No. 21-cr-00036-ELH

JACKY LYNN MCCOMBER

\*

\* \* \* \* \*

**MOTION TO FILE OBJECTIONS TO GOVERNMENT’S PROPOSED GUIDELINES  
ENHANCEMENTS AND PRESENTENCE INVESTIGATION  
REPORT OVER PAGE LIMIT**

Defendant Jacky McComber, by and through undersigned counsel, hereby moves, pursuant to Local Rule 105.3 (setting page limitations for various court submissions), to file an oversize sentencing submission in this matter. Ms. McComber’s case presents significant factual and legal matters relevant to sentencing which required a sentencing submission in excess of the limits set forth in Local Rule 105.3.

Wherefore, Ms. McComber requests leave to file an oversize sentencing submission.

Dated: April 19, 2024

Respectfully submitted,

JAMES WYDA  
Federal Public Defender

/s/ Andrew S. Tulumello

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/s/ Patricia L. Richman

Patricia L. Richman (Bar No. 803572)  
(signed by Andrew S. Tulumello with  
permission of Patricia L. Richman)  
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*Counsel for Defendant Jacky Lynn  
McComber*

**CERTIFICATE OF SERVICE**

I hereby certify that on April 19, 2024, a copy of the foregoing was served via CM/ECF to parties in this matter.

\_\_\_\_\_/s/\_\_\_\_\_  
Andrew S. Tulumello